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Attorneys for Plaintiff
 SUSTAINABLE MODULAR MANAGEMENT, INC.

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, for the use and)	Case No. 2:20-cv-00790-GMN-NJK
benefit of SUSTAINABLE MODULAR)	
MANAGEMENT, INC., a Texas corporation,)	STIPULATION AND ORDER FOR A
<i>Plaintiff,</i>)	14-DAY EXTENSION OF TIME FOR
v.)	SMM TO FILE A RESPONSE TO
)	DEFENDANTS' MOTION FOR
JE DUNN CONSTRUCTION COMPANY, <i>et al.</i> ,)	RECONSIDERATION
<i>Defendants.</i>)	
)	FIRST REQUEST FOR EXTENSION

This Stipulation to extend Sustainable Modular Management, Inc.'s deadline to respond to Defendants' Motion for Reconsideration (the Motion") is made by and between Plaintiff United States of America, for the use and benefit of Sustainable Modular Management, Inc. ("Plaintiff") and Defendant JE Dunn Construction Company ("JE Dunn") through their respective counsel, in light of the following facts:

RECITALS

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2 1. On April 16, 2024, JE Dunn Construction Company (“JE Dunn”) filed its Motion
3 to Reconsider [Dkt. 132] the Court’s March 21, 2024 Order Granting Motion for Partial
4 Summary Judgment filed by SMM [Dkt. 127]. The response to that Motion to Reconsider is
5 currently due on April 30, 2024.

6 2. Due to prior obligations and conflicts with SMM’s schedule, SMM consulted with
7 opposing counsel to request a 14-day extension of time to file a Response to the Motion to
8 Reconsider. Defendants graciously responded that they did not oppose such a request under the
9 circumstances, as described below.

10 3. Specifically, SMM’s counsel is a candidate for a school-board election in the
11 Grapevine-Colleyville Independent School District, located in Tarrant County, Texas, where he
12 resides and in which one of his children currently attends school. Early voting begins on
13 April 22, 2024 and runs through April 30, 2024, with election day on May 4, 2024. Between
14 now and then, the undersigned counsel is and will be spending a significant amount of time
15 campaigning and working the polling locations once early voting begins.

16 4. In addition to the campaign commitments, the undersigned continues to have a
17 heavy workload, including preparing and filing two discovery motions, preparing for and
18 participating in a deposition set for April 25, 2024, preparing a response to a motion to dismiss in
19 federal court that is due on April 26, 2024, preparing a response to a motion for summary
20 judgment that is due on April 30, 2024, and preparing for an evidentiary hearing that is
21 scheduled for May 1, 2024.

22 5. Accordingly, the Parties stipulate to a 14-day extension of time for SMM to
23 respond to Defendants’ Motion to Reconsider until and including May 14, 2024.

24 6. There is good cause to grant this stipulation because SMM requires additional
25 time to prepare a proper response on behalf of SMM to JE Dunn’s Motion for Reconsideration.

26 7. JE Dunn does not oppose the relief requested herein and has graciously agreed to
27 submit it as a stipulation. This stipulation is filed in good faith and not intended to cause delay.
28

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8. Pursuant to Local Rule IA 6-1, SMM respectfully requests that the Court extend SMM's deadline to respond to JE Dunn's Motion for Reconsideration through May 14, 2024.

9. This stipulation renders moot SMM's previously-filed unopposed motion for extension of time.

STIPULATION

DATED this 30th day of April, 2024

DATED this 30th day of April, 2024

MORRIS LAW GROUP

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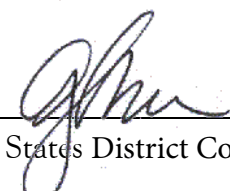
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ORDER

IT IS SO ORDERED.


United States District Court Judge

DATED: April 29, 2024